UNTIED STATES DISTRICT COURT DISTRICT OF MINNESOTA

Court File No. 21-cv-01061 (NEB/ECW)
Court File No. 21-cv-01062 (PJS/ECW)
Court File No. 21-cv-00908 (JRT/KMM)

DAVID GAMWELL,	
Plaintiffs,	Court File No. 21-cv-01063 (SRN/KMM)
v.	
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP,	
Defendants.	
MARY TROWER,	
Plaintiffs,	Court File No. 21-cv-01064 (WMW/BRT)
v.	
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP,	
Defendants.	
MATTHEW McDONALD,	
Plaintiffs,	Court File No. 21-cv-01065 (MJD/TNL)
V.	
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP,	
Defendants.	

PAUL KIRK,	
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP, Defendants.	Court File No. 21-cv-01066 (PJS/DTS)
ROBERT RICHMOND,	
Plaintiffs,	Court File No. 21-cv-01067 (NEB/TNL)
V.	
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP,	
Defendants.	
WILLIAM McDONALD,	
Plaintiffs,	Court File No. 21-cv-01068 (ECT/DTS)
v.	
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP, Defendants.	

MARVIN CATES,	
Plaintiffs,	Court File No. 21-cv-01106 (JRT/KMM)
V.	
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP,	
Defendants.	
JOAN PILGREEN,	
Plaintiffs,	Court File No. 21-cv-01107 (DWF/HB)
v.	
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP,	
Defendants.	
MICKEY SELF,	
Plaintiffs,	Court File No. 21-cv-01108 (DSD/KMM)
v.	
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP,	

III DOLD WEST	
HAROLD WEST,	
Plaintiffs,	Court File No. 21-cv-01109 (DSD/ECW)
v.	
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP,	
Defendants.	
DON FIRMIN,	
Plaintiffs,	
v.	Court File No. 21-cv-01110 (JRT/BRT)
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP,	
Defendants.	
AUDIE GADDIS,	
Plaintiffs, v.	Court File No. 21-cv-01111 (NEB/DTS)
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP, Defendants.	

BONNIE SMITH,	
Plaintiffs,	
V.	Court File No. 21-cv-01112 (JRT/HB)
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP,	
Defendants.	
JOE WILSON,	
Plaintiffs,	
V.	Court File No. 21-cv-01113 (SRN/HB)
SYNGENTA CROP PROTECTION, LLC., SYNGENTA AG, SYNGENTA SEEDS, LLC, CHEVRON U.S.A., INC., and CHEVRON PHILLIPS CHEMICAL COMPANY LP,	
Defendants.	

PLAINTIFFS' MOTION FOR CONSOLIDATION OF ACTIONS

Plaintiffs, by and through counsel, hereby move this Court for an order consolidating these cases to District of Minnesota.

This motion is based on the pleadings, files and records herein, including Plaintiffs' Memorandum for Appointment of Single Judge in Minnesota, filed in support of this Motion.

Dated: May 7, 2021 Respectfully submitted,

<u>s/Daniel E. Gustafson</u> Daniel E. Gustafson (#202241) Amanda M. Williams (#341691)
GUSTAFSON GLUEK PLLC
Canadian Pacific Plaza
120 South Sixth Street, Suite 2600
Minneapolis, MN 55402
Tel: (612) 333-8844
dgustafson@gustafsongluek.com
awilliams@gustafsongluek.com

Attorneys for Plaintiffs